

Raymond McGee
7 Pine Ledge Road
Brant Lake, NY 12815

February 12, 2019

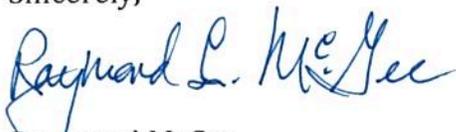
U. S. Environmental Protection Agency
5 Post Office Square, Suite 100 (OSRR02-2)
Boston, Massachusetts 02109-3912

Dear Ms. Hennessy,

I have completed the questionnaire that I received December 12, 2018. I have prepared a typed version of my responses to the questions. Additionally, you will find multiple disks enclosed with this package. Each disk contains a file of my responses to the question and files containing all documents referenced in my response. We are expecting a substantial snowstorm this Tuesday and Wednesday and therefore I am endeavoring to get all of this documentation out in the mail today.

In addition to this questionnaire, I received notification for reimbursement of funds spent by the U.S. EPA. Previously I had responded with the financial information concerning Ansonia Copper and Brass and its inability to make financial reimbursement. My understanding is that piece of my response has been fulfilled. With regards to CUNI, LLC, as I explained during one of our discussions, BWM Metals, the holding company for CUNI, LLC and for ASM, LLC filed for dissolution. I have no details concerning this action and reference this in my responses to the questionnaire. I intend to contact you either Tuesday or Wednesday of this week to discuss this matter. Hopefully, we will have completed our discussion by the time you receive this information.

Sincerely,



Raymond McGee
raymondmcgee@mac.com
203-231-3542

Question 1

- 1.a. Raymond McGee
7 Pine Ledge Road
Brant Lake, NY 12815
raymondmcgee@mac.com
- 1.b. None
- 1.c. None

Question 2 Legal and Financial Information

- 2.a CUNI, LLC and ASM, LLC and BWM Metals, LLC were all formed December 14, 2012. CUNI, LLC and ASM, LLC were both wholly owned subsidiaries of BWM Metals. CUNI, LLC operated as a cost center with the production of cast billets for ASM. ASM had both revenues and operating costs. The only taxes filed were by BWM Metals, LLC. There are no tax filings for CUNI, LLC.

Return for BWM Metals for 2013 both Federal and State are attached.

CUNI was dissolved on or about August 2014. I have no copy of the 2014 federal or state tax returns. BWM Metals, LLC, Ansonia Specialty Metals, LLC (ASM), and CUNI, LLC were dissolved in 2014. BWM Metals and/or BW Metals in Chicago would have managed any tax matters after 2013 filing. Address and contact provided later.

- 2.b. I have no audited financials for CUNI, LLC.

2.c. CUNI, LLC and ASM, LLC signed promissory notes with McGee Family Holdings II, LLC and BWM Metals, LLC. Copies of Promissory Notes attached. CUNI, LLC signed a Promissory Note and Inter-Creditor Agreement with Ansam Metals Corporation. Copies attached.

- 2.d.1. CUNI, LLC was incorporated on December 7, 2012

- 2.d.ii CUNI, LLC was incorporated in Delaware

- 2.d.iii **Officers**

Raymond McGee CEO December 2012 to December 2013
Joshua McGee V.P Sales December 2012 to December 2013

Gleb Zarkh from December 2012 to August 2014
Ryan Sauterfield from December 2012 until 2014
William Wolf Chairman from December 2012 to August 2014

2.d.iv **Directors of BWM Metals, LLC**

McGee Family Holdings II, LLC was an investor and lender to BWM Metals, LLC a holding company. BWM Metals, LLC had two wholly owned Delaware limited liabilities companies, CUNI, LLC located in Ansonia, CT and ASM, LLC located in Waterbury, CT. McGee Family Holdings II, LLC owned 50% of BWM Metals, LLC All dates provided are to the best of my knowledge and in many cases are the actual document dates.

Raymond McGee from December 2012 to August 2014
7 Pine Ledge Road
Brant Lake, NY 12815
203-231-2542
McGee Family Holdings, II LLC

Joshua McGee from December 2012 to December 2013
688 Springhill Lane
Cincinnati, Ohio 45226
708-203-2792
McGee Family Holdings II, LLC

BW Metals, LLC was an investor and lender to BWM Metals, LLC, and a holding company. BWM Metals, LLC had two wholly owned Delaware limited liabilities companies, CUNI, LLC located in Ansonia, CT and ASM, LLC located in Waterbury, CT. BW Metals owned 50% of BWM Metals.

William Wolf from December 2012 to August 2014
Suite 960
900 N. Michigan Ave.
Chicago, IL 60611
312-648-6810

Gleb Zarkh from December 2012 to August 2014
Suite 960
900 N. Michigan Ave.
Chicago, IL. 60611
312-648-6810

Ryan Sauterfield from December 2012 to August 2014
Suite 960
900 N. Michigan Ave.

Chicago, IL 60611

James Wareham from January 2013 to January 2014
12054 N. 114th Way
Scottsdale, AZ 85259
312-469-5371
Outside Director

2.d.vi.ASM, LLC
725 Washington Ave.
Waterbury, CT.

BWM Metals
Suite 900
900 N. Michigan Ave.
Chicago, IL 60611

2.e. No bankruptcy filing that I am aware of.

2.f.i. CUNI, LLC, a wholly owned subsidiary of BWM Metals, LLC and ASM an associate subsidiary of BWM Metals, LLC, LLC filed for dissolution in August, 2014. The dissolution was the result of operating losses and a lack of available financing. The dissolution process was controlled and directed by Ryan Sauterfield thru BWM Metals and BW Metals. My employment was terminated in December of 2013.

2.f.ii. To my knowledge CUNI, LLC was terminated in January 2014. ASM, LLC. and BWM Metals, LLC' were completely dissolved by August of 2015. The exact dates and transaction contents should be available from Ryan Sauterfield.

2.f.iii. Ryan Sauterfield managed the dissolution of CUNI, LLC and ASM, LLC. I did not receive the dissolution documents. Ryan worked for BW Capital Partners and BW Metals, LLC. Ryan's contact information is:

Ryan Sauterfield
Suite 900
900 N. Michigan Ave.
Chicago, IL 60611
312-648-6810

2.f. iv. See answer in 2.f.iii

2.f.v. I have no knowledge of the asset sale or distribution. Ryan Sauterfield should be able to supply these details.

2.g. I am unaware of any sales of assets of CUNI, LLC.

2.h. The predecessor to CUNI, LLC was Ansonia Copper & Brass, Inc. (ACB). CUNI, LLC purchased the casting equipment and associated support equipment such as saws and handling equipment from ACB. CUNI, LLC entered into a processing agreement with ACB to cast the material for ASM. Certain permits were transferred to CUNI, LLC. ARCO/BP provided an Indemnification Agreement to CUNI, LLC for these operations. There are no Successors to CUNI, LLC to my knowledge.

2.i. To my knowledge, CUNI, LLC has never done business under any other name.

2.j. The financial operating results for CUNI, LLC were prepared by

Steve Turner
CFO for BWM Metals, LLC
323 Woodpond Rd.
Cheshire, Ct.
860-944-2512

Gleb Zarkh
Secretary BWM Metals
Suite 960
900 N. Michigan Ave.
Chicago, IL 60611
312-648-6810

COMMENT: As stated above the financial results for CUNI, LLC were Consolidated into the financial reports of BWM Metals, LLC. The only results for CUNI, LLC were for the expenses of operations. These expenses were transferred to BWM Metals, LLC and were consolidated for financial reporting.

2.k. UCC Filing for CUNI, LLC is attached

2.l. I have attached all copies of minutes for CUNI, LLC; ASM, LLC; and BWM Metals, LLC. The minutes begin January 2013 and the last meeting notes are July 2013. Copies attached.

Question 3. Relationship(s) to Other Entities

3.a. Ansam Metals Corporation was a supplier of copper nickel alloy, copper, and nickel to Ansonia Copper and Brass (ACB) for many years. When CUNI, LLC was formed, the relationship with Ansam was continued. At this time, December 2012, ACB owed Ansam money for material delivered to ACB. A Mutual Release between ACB and Ansam was signed December 14, 2012. A Promissory Note between Ansam and CUNI, LLC was signed December 14, 2012. An Inter-creditor Agreement was signed December 14, 2012 between CUNI, LLC and Ansam and subsequently its successor, K & Z Holdings, Inc. continued to supply these materials previously described to CUNI, LLC until approximately December 2013.

CUNI, LLC was a wholly owned subsidiary of BWM Metals as was ASM, LLC. CUNI, LLC converted the materials supplied by Ansam/K & Z Holdings into cast billets for conversion into tubular products by ASM, LLC. The as-cast billets were transferred at cost to ASM.

3.b. i. The relationship between Ansam/K & Z Holdings and CUNI, LLC was as a supplier of raw material. The material was purchased and paid for by ASM and received by CUNI, LLC and subsequently converted as described

3.b.ii. The contract was initiated on December 14, 2011 and was terminated on or about March 2014. The contract was with Ansam and its successor, K & Z Holdings.

3.b.iii. I have no shipment/purchase records between CUNI, LLC, ASM and Ansam or K & Z Holdings and unable to comment on shipment quantities.

3.b.iv. The materials were shipped from Ansam /K & Z Holdings on an as-required basis. I have no details of the shipment frequency.

3.b.v. I have no knowledge concerning the providing or availability of MSDS documents.

Comment Section 3.c. ASM never had an operating presence in Ansonia, CT. The only related operation in Ansonia was CUNI, LLC. ASM, LLC was a separate subsidiary wholly owned by BWM Metals. ASM, LLC was located in Waterbury, CT.

3.c.i. Ansam was the supplier of material described above. ASM purchased the material from Ansam/K & Z Holdings and the material was delivered

to CUNI, LLC, a separate wholly owned subsidiary of BWM Metals, LLC, for processing

3.c.ii. . The contract dates were from December 14, 2012 until March 2014.

3.c.iii. I do not have the purchased or shipment volumes.

3.c.iv. I have no knowledge of the purchasing/shipping frequency other than it was on an as required basis.

3.c.v. I have no knowledge if MSDS documents were supplied.

3.d.i. ASM, LLC operations were exclusively in Waterbury, CT and involved the production of copper nickel tubing from copper nickel billets that were cast at CUNI, LLC located in Ansonia. CUNI, LLC leased the building and land that housed the casting equipment from ACB thru an Operating Lease. ASM had no physical presence or business in Ansonia, CT. ASM, LLC purchased the required copper nickel materials and other associated alloying elements, paid the labor bills for the ACB employees who performed the casting work, paid for all supplies and other operating costs of CUUNI, LLC. CUNI, LLC produced as cast billets, cut them to prescribed block length and shipped them to ASM, LLC located in Waterbury, CT. ASM, LLC returned the tube making process scrap to CUNI, LLC for recasting into billets.

3.d.ii. The relationship between ASM and CUNI, LLC began December 14, 2012 and ended on or about January 2014.

3.d.iii. There are two volumes to be addressed. The first is the purchase of new material purchased by ASM and supplied by Ansam/K & Z Holdings and received at CUNI, LL. The second volume is the process scrap from ASM that was returned by ASM to CUNI, LLC for reprocessing into billets. I have no records or knowledge of either of these shipment volumes.

3.d.iv. I have no specific knowledge of the frequency of shipments. The new material from Ansam/K & Z holdings was purchased and shipped as required. The process scrap was returned on a regular generated basis.

3.d.v. As explained previously, I have no knowledge of the MSDS documents.

3.e. ASM was not operating at the site. CUNI, LLC had an Operating Agreement with ACB to supply the workforce required to process the material. CUNI, LLC was responsible for all supplies and services. The entire site in Ansonia was occupied by CUNI, LLC

3.f.i. Atlantic Metals & Alloys, LLC supplied materials required for the

conversion of the materials supplied by Ansam and the reprocessing scrap from ASM into acceptable as cast billets. It is my understanding

the Manganese supplied by Atlantic Metals was used to deoxidize the molten material prior to being cast into billets. The Manganese may also have been required to facilitate the conversion of the as-cast billets into the tubular products made at ASM.

3.f.ii. I have no specific knowledge of the contract dates. However, since the Manganese was an essential element required for the production of acceptable as-cast billets, I assume the contract dates with Atlantic Metals paralleled that of Ansam/K & Z Holdings.

3.f.iii. I have no specific knowledge of the volume of material shipped by Atlantic Metals to CUNI, LLC.

3.f.iv. I have no specific knowledge of the frequency of shipments from Atlantic Metals other than it was on an as required basis.

3.f.v I have no knowledge of the availability or supply of MSDS documents.

Comment Section 3.g.i. ASM never had an operating presence in Ansonia, CT. The only related operation in Ansonia was CUNI, LLC.. ASM, LLC was a separate subsidiary wholly owned by BWM Metals. ASM, LLC was located in Waterbury, CT.

3.g.i ASM was located at Waterbury and was responsible for the conversion of the as-cast billets supplied by CUNI, LLC into tubular products. The contract for casting work at CUNI, LLC for ASM began on December 14, 2012 and terminated on or about January 2014.

3.g.ii. The ASM operations at Waterbury and the CUNI,LLC operations in Ansonia began December 14, 2012 and ended on or about January 2014.

Question 4 Insurance

4.a. Insurance policies for the Site are attached. I am unaware of any additional policies.

There is an **Environmental Indemnification Agreement with BP/ARCO** that was created in **November 1985** at the time of sale by BP/ARCO to Ansonia Copper & Brass, copy attached. This Environmental Indemnification Agreement was assigned to CUNI, LLC by ACB and BP/ARCO at the time of the sale of the ACB casting equipment to CUNI, LLC.

4.b. To my knowledge, there are no other insurance policies in effect then or now.

4.c. I have no access to nor am I aware of any additional casualty, liability and/or pollution insurance.

4.d. I have no access to nor am I aware of any casualty, liability and/or pollution insurance.

4.e. I am unaware of any settlements.

4.f. I have no knowledge of any communications regarding settlements.

4.g. Other than the information supplied, I have no knowledge or access to any financial records.

4.h. I do not have this information. All that I have are the companies that provided the various insurance coverage.

Question 5 Respondent's Operations

5.a CUNI, LLC began operations at the Site on December 12, 2012. CUNI operations ceased on or about December 2013.

5.b.1. CUNI, LLC sole purpose was to melt and subsequently cast the copper nickel into billets that were then cut into blocks for extrusion and subsequently processed at ASM, LLC in Waterbury, Connecticut. CUNI, LLC received "new" material from Ansam/S & Z in addition to the process scrap from ASM, LLC. The material was received, weighed, prepared for melting and then charged into the furnace to be melted.

5.b.ii The operation melted copper, nickel and alloying elements in electrical powered furnaces that were lined with refractory materials. I do not know the chemical properties of these materials. A mixture of oil and graphite was used to lubricate the casting molds. A graphite powder was used to cover the molten material. Upon cooling the billets were then cut to appropriate lengths on a saw. A water-soluble solution was used in this process. The billets were then palletized and shipped to ASM. The furnaces were hydraulically operated and therefore some form of oil was used in this hydraulic/mechanical lifting apparatus. I have no specific knowledge of the chemistry of these materials nor do I have knowledge of how they were stored.

5.b.iii I have no specific knowledge of the chemistry of these materials nor do I have knowledge of how they were stored.

5.b.iv I have no knowledge as to how or where these items were stored.

5.c The only permit I have is that for the Stormwater Pollution Plan that was previously submitted.

5.d. I do not have the details of the MSDS sheets for those materials specifically used by CUNI, LLC in the casting operation. I do have the MSDS sheets for the entire ACB operation. These were previously supplied and are attached to this document.

Comment:

In February, 2018, I submitted a detailed filing with the United States EPA. This response contained information concerning the casting operation at ACB. This casting operation became CUNI, LLC in December 2012 with the purchase of equipment from ACB, the creation of a lease between ACB and CUNI, LLC and agreement whereby ACB provided the labor to perform the work for CUNI, LLC. I have extracted the information from the February 2018 report that addresses the waste streams for CUNI, LLC.

5.e. Describe each type of waste brought to or generated at the Site...

The waste streams include:

Metals: skimming and related metals which originate from the casting process, bag house dust, hydroxide casting cooling tower sludge, steel scrap & empty drums

Miscellaneous Waste: scrap wood, cardboard, trash

Name	Generation Process	Disposal
Skimming/ Spills/ Off mix		Recycle
AREG Ash (skimming)	Ash from casting with metal byproducts and a high degree of AFCR ash	Being recycled, would be hazardous if it becomes waste
Copper Oxides	Oxide, scale,	Being recycled for metal value
AFCR Ash (skimming)	Ash with 35% copper	
Scrap Alloys-mixed and unmixed	From ASM	Recycle for metal value
Furnace lining cement/ refractory	Spent furnace lining with slag and cement	Recycled cement is aggregate and metal is re-melted
Steel scrap/ empty drums	Clean and dry steel scrap and empty/ clean drums are crushed	Recycled for its metal value with scrap dealers
Scrap wood	Plant wide spent wood (pallets, boxes various shipping containers)	Disposed as bulky debris
Cardboard	Clean dry cardboard	Recycle (ADS)

Casting cooling tower sludge	Sediment from bottom of cooling water tank	
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See following table:

1. Skimmings

Skimmings and related metals originate from a variety of sources and include:

Skimming – Skimming is a byproduct of the casting process. Charcoal and graphite are used as a covering over molten metal to help contain the heat in the casting furnaces, much like the lid of a pot. Prior to pouring, the charcoal and graphite are removed by the operators by skimming off the top surface of the molten metal using rake-like device called a skimmer. Included in the skimmings with the charcoal and graphite is a high percentage of semi-precious metals.

AREG Ash – Ash from casting furnaces mixed with metal byproducts of similar composition and containing a minimum quantity of zinc. It is considered a higher grade than AFCR ash.

Copper Oxides – Metal chips, shavings, and floor sweepings containing oxide, scale, chips and miscellaneous metal particles.

Copper Scale & Mud from Tanks – Scale from annealing furnaces as the metal oxidizes when it cools; water recirculation tanks with copper oxide; sediment from the quench tank.

All of these skimming and related metals are combined and sold to be recycled for their metal value, particularly copper, zinc and nickel. This material is approximately 50-60% metal and the metal is approximately 60% copper **Waste**

Determination: This material is not considered a hazardous waste because it is recycled and reclaimed. If it is spilled or disposed it is considered a hazardous waste for cadmium (D006), chromium (D007), and lead (D008).

2. Furnace Lining and Refractory

Furnace lining and refractory are shipped once or twice per year. The material is accumulated in metal boxes or directly on the floor in the staging area (north end) of the Castings building for large solid pieces. The linings consist of cement, metals and slag that are inseparable from the cement. This material is shipped by Industrial Waste Recycling of Shannon, Illinois to Barnes Environmental International

in Ontario, Canada where the metal is separated from refractory by a process called ball milling. Once separated, both the metal (primarily for the copper) and the processed refractory are sold as feedstock for other industrial processes.

Waste Determination: This material is not considered a hazardous waste because it is recycled and reclaimed. See Attachment A: Regulatory Status of Refractory.

3. Steel Scrap & Empty Drums

This waste includes clean and dry steel scrap and clean, empty drums. ACB generates approximately 210,000 pounds per year. Steel drums are crushed by the “cabbage-machine” in Metal Storage and this scrap steel is sold to scrap dealers where it is recycled for its metal value. Steel scrap is currently sold to Jacobs Brothers in Derby.

Waste Determination: This material is not a hazardous waste, Universal Waste or Connecticut Regulated Waste.

4. Scrap Wood

Wood is used at ACB as a packing material for boxes and crates. Wood scraps and debris are accumulated outdoors alongside the floodwall near the bridge in a scrap wood dumpster. The scrap wood dumpsters are then removed by “Call Peter”.

Waste Determination: Scrap wood is not hazardous, Connecticut Regulated, or Universal Waste.

5. Cardboard

Cardboard is used at ACB as a packing material for materials shipped, received and stored. Clean, used cardboard is recycled. If it becomes contaminated with oil and grease it is disposed of with “Oily Soaked Solids & Floor Sweepings.” A 40-yard compacted roll-off is shipped from ACB by American Disposal Systems for recycling every 6 weeks (approximately).

Waste Determination: Clean, used cardboard is not hazardous, Connecticut Regulated, or Universal Waste.

6. Trash

Trash is generated in various office and plant activities and is similar to residential refuse. Trash is taken by American Disposal Services and incinerated.

Waste Determination: Trash is not hazardous, Connecticut Regulated, or Universal Waste.

5.f. Violations:

There are six NOV's filed for the site related to NPDES violations.

- 2/7/2007 Enforcement Action I : NOVWRIN07010

- 9/7/2011 Enforcement Action ID: NOVWRIN11019
- 9/30/2011 Enforcement Action ID: NOVWSWDS11072
- 10/29/2007 Enforcement Action ID: NOVWRIN07042
- 4/3/2007 Enforcement Action ID: NOVWRIN07013EF
- 12/4/2007 Enforcement Action ID: NOVWRIN07017EF

No site legal actions were brought against CUNI, LLC or any of the associated LLC's including ASM, LLC; and BWM Metals, LLC.

Question 6 Wastes
See attachment.

Question 7.

7.RESPONDENTS DISPOSAL/TREATMENT/STORAGE/RECYCLING/SALE OF WASTE

- a. Lawrence Ford retired former V.P Operations for Ansonia Copper & Brass, Inc
 Steve Cronk Director of Safety
 Robert McGann Engineering Manager Ansonia Copper & Brass, In
- b. Lawrence Ford retired former V.P Operations for Ansonia Copper & Brass, Inc
 Steve Cronk Director of Safety
 Robert McGann Engineering Manager Ansonia Copper & Brass, Inc.
 Steve Daniels
 Santo Manicone
- c. Lawrence Ford retired former V.P Operations for Ansonia Copper & Brass, Inc
 Steve Cronk Director of Safety
 Robert McGann Engineering Manager Ansonia Copper & Brass, Inc.
 Steve Daniels
 Santo Manicone
- d. Lawrence Ford
 Vice President of Operations
 486 Lakeside West
 Waterbury, Ct.
 203-574-3138
 September 2002 to December 2013

Steve Cronk
Safety and Security Director
203-494-0265
No Address or email
June 2004 to December 2011 (estimated)

Robert McGann
General Foreman Maintenance
323 Lounsbury Drive
Waterbury, Ct 06706
203-619-1567
September 2002 to December 2013

Steve Daniels former engineer at FSS
Facility Support Services
2685 State Street
Hamden, Ct
203-288-1281
September 2002 to September 2010 (estimated)

Santo Manicone former principal at FSS
Facility Support Services
2685 State Street
Hamden, Ct
203-288-1281
September 2002 to December 2011 (estimated)

e. None that I am aware of.

8 Site Characteristics:

- a. I have no records of any leaks, spills or releases. Nor am I aware of any such events during the time of operation by CUNI, LLC.
- b. I have no information regarding spills, leaks or releases during the time of CUNI, LLC operations at the site.
- c. To my knowledge there were no government inspections of the site during CUNI, LLC operations.
- d. The condition of the property and all environmental reports were provided in the previous report of February 2018. I have no final report for the site condition at closure by CUNI, LLC.

e. All environmental studies have been supplied to US EPA previously as described above. I have no additional information.

Question 9.

I have no additional names of individuals that may be able to provide additional information.

Question 10.

There are two sources for the information supplied in this response. The first source is documentation I have retained throughout the course of my employment with CUNI, LLC. The second source of information for this response was from certain previously supplied responses in the February 2018 response. Whatever information that may have been used in this response was documented as having been received from others in my February 2018 response.

Question 11.

- a. i. I do not have a copy of our document retention policy.
- a.ii. I have no knowledge of how or when records may have been destroyed.
- a.iii. I know of no dates of destruction
- a.iv. I have no knowledge of what, if any, information may have been destroyed.
- a.v. I am unaware if any person was specifically responsible for this activity. My employment had ceased in December of 2013 and the operations, CUNI, LLC; ASM, LLC; and BWM Metals, LLC all ceased operation after this date.

Appendix for EPA Response Documents

1. Federal and State Tax Return for BWM Metals 2013
2. Promissory Note BW Metals and CUNI, LLC 12/5/2012
3. Promissory Note McGee Family Holdings II and CUNI, LLC 12/5/2012
4. UCC Filing for CUNI, LLC
5. ANSAM/ACB Mutual Release 12/14/2012
6. Assignment and Assumption Agreement ACB, ASM, CUNI, LLC , ANSAM 12/5/2012
7. Inter-creditor Agreement ANSAM abd CUNI, LLC 12/14/2012
8. Amended and Restated Promissory Note ANSAM, ASM, CUNI,LLC November 2013
9. Assignment and Assumption Agreement K&Z, BW Metals and CUNI,LLC
10. Premium payment summary
11. Policy Documentation
 1. General Liability National Union Fire Insurance
 2. Crime National Union Fire Insurance
 3. Automobile National Union Fire Insurance
 4. Umbrella National Union Fire Insurance
 5. Property National Union Fire Insurance
 6. Boiler & Machinery National Union Fire Insurance
 7. D&O, EPLI, Fiduciary National Union Fire Insurance
 8. Workers Compensation National Union Fire Insurance
- 12 Insurance Declarations
 1. Commercial Crime Policy
 2. Business Auto
 3. Commercial Umbrella
 4. Coverage Schedule
 5. Workers Compensation Liability
13. Insurance Equipment Breakdown
14. British Petroleum/ARCO Environmental Indemnification Agreement and Letters

15. Waste Streams from CUNI, LLC

16. Meeting Minutes

16.a January 2013

16.b February 2013

16.c March 2013

16.d April 2013

16.e May 2013

16.f June 2013

16.g July 2013